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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SAMUEL ROBINSON,

Defendant.

Adv. Pro. No. 10-04791 (SMB)

STIPULATION AND ORDER FOR SUBSTITUTION OF DEFENDANT

WHEREAS, on December 1, 2010, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et. seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, filed the above-captioned avoidance action against defendant Samuel Robinson; and

WHEREAS, Samuel Robinson died on May 26, 2014.

IT IS THEREFORE MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Rima Robinson, in her capacity as the Personal Representative of the Estate of Samuel Robinson, as follows:

1. The Estate of Samuel Robinson ¹ (the “Estate”), and Rima Robinson, in her capacity as the Personal Representative of the Estate of Samuel Robinson (collectively referred to as “Defendants”), are hereby substituted into this action in place of Samuel Robinson, deceased, and the complaint shall be deemed so amended.

2. The Clerk of the Court is hereby directed to amend the caption to remove Samuel Robinson and substitute the Estate of Samuel Robinson and Rima Robinson, in her capacity as the Personal Representative of the Estate of Samuel Robinson, as reflected on Exhibit A to this Stipulation.

3. Counsel for the undersigned Defendants: (i) expressly represents that she has the authority to accept service of the Amended Complaint on behalf of Defendants, (ii) waives service of the summons and the Amended Complaint on behalf of Defendants, and (iii) hereby waives any defenses based on insufficiency of process or insufficiency of service of process of

¹ The Estate of Samuel Robinson, Court File No. 502014CP004129XXXXNB in the Circuit Court for Palm Beach County, Florida, Probate Division.

the summons and Amended Complaint on behalf of Defendants, and (iv) expressly agrees that the amendment noted in Paragraph 1 hereof shall not be considered an amendment under Federal Rule of Civil Procedure 15(a)(1)(A) or (B).

4. Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have.

5. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: November 3, 2014

New York, New York

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

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Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

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*Attorneys for Defendants the Estate of Samuel
Robinson and Rima Robinson, in her capacity
as Personal Representative of the Estate of
Samuel Robinson*

SO ORDERED.

Dated: November 3rd, 2014

New York, New York

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN

UNITED STATES BANKRUPTCY JUDGE